O'NEILL / HASSEN

Attorneys at Law

January 12, 2021

VIA ECF and Email
Honorable Paul G. Gardephe
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe, U.S.C

Dated: January 13, 2021

RE: *United States v. Omar Amanat*, 15 Cr 536 (PGG) CJA Financing

Dear Judge Gardephe:

I represent Omar Amanat pursuant to the Criminal Justice Act. I am writing to request that the Court apportion additional funds for associate counsel Jacob Barclay Mitchell *nunc pro tunc* December 26, 2020.

As the Court is aware, this is an extremely complex case and numerous issues have arisen post trial that warrant counsel's careful attention. Mr. Amanat's trial counsel requested to be relieved pursuant to a conflict – Mr. Amanat and trial counsel's relationship with a government agent, Spyros Enotiades. The Court appointed me as CJA counsel after a careful analysis of Mr. Amanat's finances.

I requested that the Court appoint Mr. Mitchell as associate counsel to assist with the Rule 33 motion, any *Fatico* hearings, and at sentencing. Mr. Mitchell has worked on many other technically complex cases and has relationships with several experts in computer forensics. This case is sufficiently complex that the appointment of associate counsel is warranted. Mr. Mitchell worked on the rule 33 motion diligently, ever mindful of the need to conserve CJA funds. His contributions to our analysis and the drafting of the motion were invaluable. However, over the Christmas holiday Mr. Mitchell exceed the 100 hours the Court allocated. I am respectfully requesting an additional 50 hours for Mr. Mitchell *nunc pro tunc* to December 26, 2020.

I thank the Court for its consideration of this request. I do not make it lightly.

Respectfully submitted,

/s/

Grainne E. O'Neill

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